

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

GURDEEP SUNGH BOPARAI,

Plaintiff,

v.

AUBURN POLICE DEPARTMENT,

Defendant.

Case No. 2:23-cv-00825-JNW

**STIPULATED MOTION FOR
EXTENSION OF TIME**

NOTE ON MOTION CALENDAR:
JANUARY 11, 2024

STIPULATION

Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiff Gurdeep Singh Boparai and Defendant Auburn Police Department (together “the Parties”), STIPULATE AND AGREE to extend the noting date for Defendant’s Motion to Dismiss (Dkt. No. 8) to March 15, 2024. The stipulation is based on the following:

WHEREAS, the Court granted Plaintiff motion for leave to proceed *in forma pauperis* on June 7, 2023;

WHEREAS, after the Complaint was filed on June 7, 2023, Defendant moved to dismiss the Complaint on October 4, 2023;

WHEREAS, on November 6, 2023 the Court referred this action to the Pro Bono Panel;

1 WHEREAS, the Pro Bono Panel appointed Harold Malkin and Austin Popham as pro bono
2 counsel for Plaintiff on December 18, 2023 and counsel filed appearances on December 26, 2023,

3 WHEREAS, the Court renoted Defendant's Motion to Dismiss for January 19, 2024 and
4 modified various early case deadlines (Dkt. No. 18) on December 19, 2023,

5 WHEREAS, Plaintiff's pro bono counsel need time to effectively review the filings and
6 confer with their client,

7 WHEREAS, this is the first motion and first enlargement of time requested by either party
8 in this matter. The granting of this Motion will not prejudice any party, as Defendant has agreed
9 to this extension, and this extension is being sought in good faith and not for delay or any other
10 improper purpose.

11 NOW THEREFORE, the Parties stipulate to the following:

12 1. To renote Defendant's Motion to Dismiss (Dkt. No. 8) to **March 15, 2024**.

13 2. Plaintiff will repond to Defendant's Motion to Dismiss or otherwise move in
14 accordance with the Local Rules.

15 3. The Parties agree that by **March 22, 2024** the Parties will file a joint proposed
16 schedule modifying the early case deadlines set out in the Court's October 5, 2023 Order (Dkt.
17 No. 9) and December 19, 2023 Minute Order (Dkt. No. 18).

18 4. This Stipulation and Order shall not operate as an admissison of any factual
19 allegation or legal conclusion, nor shall it operate as a waiver, nor affect any right, defense, claim
20 or objection.

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1 **STIPULATED AND AGREED TO** this 11th day of January 2024.

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3 **MORGAN, LEWIS & BOCKIUS LLP**

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26 *Attorney for Defendant*

ORDER

IT IS SO ORDERED.

DATED this 12th day of January, 2024.



Jamal N. Whitehead
United States District Judge

Presented by:

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Harold Malkin

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